IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

Date: 1/2/07

| FOR THE FREY DEFENDANTS: | FOR THE RANDOM HOUSE DEFENDANTS |
|---|--|
| James Frey | Robert Sorrentino |
| 1.1. | Senior Vice President, Taxes, Random House, Inc. |
| Date: 1/2/07 | Date: |
| | |
| James Frey | Robert Sorrentino |
| Big Jim Industries, Inc. | President, Doubleday & Company, Inc. |
| Date: 1/2/07 | |
| | Date: |
| In Rome | |
| Maya Frey | Robert Sorrentino |
| | Vice President, Taxes, Random House VG, Inc. |
| Date: 1/2/07 | |
| Date: 1 | Date: |
| - Peul herry | |
| Derek J. Meyer | Mark B. Blocker |
| McDermott Will & Emery LLP | Sidley Austin LLP |
| 227 West Monroe Street, Suite 4400 | One South Dearborn |
| Chicago, Illinois 60606 | Chicago, Illinois 60603 |
| Attorney for the Frey Defendants | Attorney for the Random House Defendants |
| · I · · · · · · · · · · · · · · · · · · | |

Date:____

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

| FOR THE FREY DEFENDANTS: | FOR THE RANDOM HOUSE DEFENDANTS |
|------------------------------------|---|
| James Frey | Robert Sorregano Senior Vice President, Taxes, Random House, Inc. |
| Date: | Date: 12/15/06 |
| James Frey | Robert Sorrentino |
| Big Jim Industries, Inc. | President, Doubleday & Company, Inc. |
| Date: | Date: 12/15/06 |
| Maya Frey | Robert Sorrentino Vice President, Taxes, Random House VG, Inc. |
| Date: | Mark B. Blocker |
| | Mark R Rlacking |
| Derek J. Meyer | Mark B. Blocker |
| McDermott Will & Emery LLP | Sidley Austin LLP |
| 227 West Monroe Street, Suite 4400 | One South Dearborn |
| Chicago, Illinois 60606 | Chicago, Illinois 60603 |
| Attorney for the Frey Defendants | Attorney for the Random House Defendants |
| Date: | Date: 12/28/2006 |

| W. Cabb | | | | |
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| FOR | THE | PI J | INT | FFC. |

| Plaintiff Marcho Vedral | Michele Snow |
|--|--|
| Larry D. Drury Ltd. Larry D. Drury Ltd. 205 W. Randolph Street. Suite 1430 Chicago. Illinois 60606 Proposed Co-Leud Class Counsel Attorney for Plaintiff Marcia Vedral | Evan J. Smith, Esquire Brodsky & Smith, LLC Two Bala Plana, Suite 602 Bala Cynwyd, PA 19004 (610) 667-6200 Proposed Co-Lead Class Comsel Attorney for Plaintiff Michele Snow |
| Date: 12-6-06 | Date: 12-6-06 |
| Plaintiff Jennifer Colui Date: | Plaintiff Atm Marie Strack Date: |
| Thomas Mulisney 708 Third Avenue, Suite 2500 New York, New York 10017 Phone: (212) 223-0800 Liaison Class Counsel Attorneys for Plaintiff Jennifer Cohn | Thomas A. Zimmerman, Jr. Zimmerman and Associates, P.C. 100 West Monroe Street, Suite 1300 Chreago, Illinois, 60603 Attorney or Plaintiff Ann Marie Struck |
| Date: | Date: |

FOR THE PLAINTIFFS:

| Plaintiff Marcia Vedral | Plaintiff Michele Snow |
|---------------------------------------|---|
| Date: | Date: |
| 3 | |
| Larry D. Drury | Evan J. Smith, Esquire |
| Larry D. Drury Ltd. | Brodsky & Smith, LLC |
| 205 W. Randolph Street, Suite 1430 | Two Bala Plaza, Suite 602 |
| Chicago, Illinois 60606 | Bala Cynwyd, PA 19004 |
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| Attorney for Plaintiff Marcia Vedral | Proposed Co-Lead Class Counsel |
| | Attorney for Plaintiff Michele Snow |
| Date: | Date: |
| Plaintiff Diane Marolda | Plaintiff Ann Marie Strack |
| Date: 12/1/00 | Date: |
| | |
| Thomas Mullaney | TTI. A TY |
| 708 Third Avenue, Suite 2500 | Thomas A. Zimmerman, Jr. |
| New York, New York 10017 | Zimmerman and Associates, P.C. |
| Phone: (212) 223-0800 | 100 West Monroe Street, Suite 1300 Chicago, Illinois 60603 |
| Liaison Class Counsel | 가 있습니다. 보고 있다는 이 사람들이다는 이 사람이 있는 그 사람들이 보고 있었다. 그 사람들이 되었다. |
| Attorneys for Plaintiff Diane Marolda | Attorney or Plaintiff Ann Marie Strack |
| | 9 |
| Date: 12.5.2000 | Date: |

FOR THE PLAINTIFFS:

| Plaintiff Marcia Vedral | Plaintiff Michele Snow |
|---------------------------------------|--|
| Date: | Date: |
| Larry D. Drury | Evan J. Smith, Esquire |
| Larry D. Drury Ltd. | Brodsky & Smith, LLC |
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| Chicago, Illinois 60606 | Bala Cynwyd, PA 19004 |
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| Attorney for Plaintiff Marcia Vedral | Proposed Co- Lead Class Counsel |
| | Attorney for Plaintiff Michele Snow |
| | |
| Date: | Date: |
| Plaintiff Jennifer Cohn | Plaintiff Ann Marie Strack |
| Date: | Date: 12-8-06 |
| | 1/1/ |
| Thomas Mullaney | Thomas A. Zimmerman, Jr. |
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| Liaison Class Counsel | Attorney or Plaintiff Ann Marie Strack |
| Attorneys for Plaintiff Jennifer Cohn | |
| Date: | Date: 12-11-2006 |

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| June (O2) | Plaintiff Jill Giles |
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| De Silve | Date: |
| Alan S. Ripka | Alan J. Statman |
| Napoli Bern Ripka LLP | Colleen M. Hegge (of counsel) |
| 115 Broadway | 2900 Chemed Center |
| New York, New York 10006 | 255 East Fifth Street |
| Attorney for Plaintiff Jimmy Floyd | Cincinnati, Ohio 45202 |
| Maney for Change many Croye | Attorneys for Plaintiff Jill Giles |
| Date: December 5, 2006 | Date: |
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| Plaintiff Pilar More | Plaintiff Shera Paglinawan |
| Date: | Date: |
| Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More | Michael David Myers Myers & Company, P.L.L.C. 1809 Seventh Avenue, Suite 700 Scattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan |
| 2000 Secretary Control of the Contro | |
| Date: | Date: |
| Plaintiff Sara Brackenrich | - |
| Date: | |
| Vincent L. DiTommaso | |
| DiTommaso & Lubin, PC | |
| 17W 220 22nd Street, Suite 200 | |
| Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sara Brackenrich | |
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Date:_

| Plaintiff Jimmy Floyd | Plaintiff Jill Giles |
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| Date: | Date: |
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| Alan S. Ripka | Alan J. Statman |
| Napoli Bern Ripka LLP | |
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| 2, | Cincinnati, Ohio 45202 |
| | Attorneys for Plaintiff Jill Giles |
| Date: 11/29/06 | Date: |
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| Plaintiff Pilar More | Plaintiff Shera Paglinawan |
| Date: 11 / 29/06 | Date: |
| 225/- | |
| Thomas E. Pakenas | Michael David Myers |
| Dale and Pakenas | Myers & Company, P.L.L.C. |
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| Attorneys for Plaintiff Pilar More | Attorney for Plaintiff Shera Paglinawan |
| Date: | Date: |
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| Plaintiff Sara Brackenrich | |
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| Vincent L. DiTommaso | |
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| Plaintiff Jimmy Floyd | Plaintiff Jill Giles | |
|---|---|--|
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| | Attorneys for Plaintiff Jill Giles | |
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| Date: | Date: | |
| Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More | Plaintiff Wendy Shaw Date: | |
| Date | Michael David Myers | |
| Date: | Myers & Company, P.L.L.C. | |
| | 1809 Seventh Avenue, Suite 700 | |
| | Seattle, Washington 98101 | |
| | Attorney for Plaintiff Shera Paglinawan | |
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| Date: 20 Nov. 06 | | |
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| Plaintiff Jimmy Floyd | Flaintiff Fill Giles |
| Date: | Date: 12-7-06 |
| Alan S. Ripka Napoli Bern Ripka LLP 115 Broadway New York, New York 10006 Attorney for Plaintiff Jimmy Floyd | Alan J Statman Colleen M. Hegge (of counsel) 2900 Chemed Center 255 East Fifth Street Cincinnati, Ohio 45202 Attorneys for Plaintiff Jill Giles |
| Date: | Date: 12-7-04 |
| Plaintiff Pilat More Date: | Plaintiff Shera Paglinawan Date: |
| Thomas E. Pakenas Dale and Pakenas 641 W. Lake Street, Suite 400 Chicago, Illinois 60661 Anorneys for Plaintiff Pilar More Date: | Michael David Myers Myers & Company, P.L.L.C 1809 Seventh Avenue, Suite 700 Seattle, Washington 98101 Attorney for Plaintiff Shera Paglinawan Date: |
| Plaintiff Sara Brackentich Date: | |
| Vincent L. DiTommaso DiTommaso & Lubin, PC 17W 220 22nd Street, Suite 200 Oakbrook Terrance, Illinois 61081 Attorney for Plaintiff Sar a Brackenrich Date: | • |

| Plaintiff Jill Giles |
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| Date: |
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| Alan J. Statman |
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| 255 East Fifth Street |
| Cincinnati, Ohio 45202 |
| Attorneys for Plaintiff Sill Giles |
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| Plaintiff Shera Paginawan |
| Date: 3 Dec. 3000 |
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| Plaintiff Wendy Shaw |
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| Michael David Myers |
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| Testorney for Plaintiff Shera Paglinawan |
| Date: 12 . 3 . 2006 |
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| Plaintiff Jimmy Floyd | Plaintiff Jill Giles |
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| Date: | Date: |
| Alan S. Ripka | Alan J. Statman |
| Napoli Bern Ripka LLP 115 Broadway | Collecn M. Hegge (of counsel) |
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| Attorney for Plaintiff Simmy Floyd | 255 East Fifth Street |
| , , | Cincinnati, Ohio 45202 Attorneys for Plaintiff Fill Giles |
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| withing Lifet Wole | Plaintiff Shera Paglinawan |
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| Dale and Pakenas | 7.9 |
| 641 W. Lake Street, Suite 400 | Date: 2/06 |
| Chicago, Illinois 60661 Attorneys for Plaintiff Pilar More | |
| | 12000000000 |
| Date: | Michael David Myers |
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| | 1809 Seventh Avenue, Suite 700 |
| | Seattle, Washington 98101 Autorney for Platniff Shera Paglinawan |
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